

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE UNITED DEVELOPMENT
FUNDING IV SECURITIES LITIGATION

Master File No. 3:15-cv-4030-M

**JOINT STIPULATION REGARDING FILING OF SECOND
AMENDED COMPLAINT AND RESPONSE THERETO**

Lead Plaintiff Louis J. D’Annibale (“Lead Plaintiff”) and defendants United Development Funding IV, Hollis M. Greenlaw and Cara D. Obert (“Defendants”), by their respective counsel, hereby stipulate to set the following schedule in the above-captioned action.

WHEREAS, on December 21, 2015, Plaintiff Michael Carter filed a purported class action complaint asserting claims against Defendants pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934;

WHEREAS, on February 12, 2016, Plaintiff Michael Carter filed an amended complaint, asserting claims against Defendants pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934;

WHEREAS, in addition to the *Carter* complaint, two related actions were filed in this District based on the same or similar allegations as the *Carter* complaint and naming the same defendants: (1) *The Charles G. and Rose M. Fairbanks Living Trust v. United Development Funding IV, et al.*, Case No. 15-cv-04055-M (filed December 23, 2015); and (2) *Anderson, et al. v. United Development Funding IV, et al.*, Case No. 16-cv-00456-M (filed January 7, 2016). (Collectively, the *Carter*, *Fairbanks Living Trust* and *Anderson* cases are referred to as the “Related Cases”);

WHEREAS, on February 19, 2016, pursuant to the Private Securities Litigation Reform Act of 1995, Lead Plaintiff, Louis D'Annibale, filed a timely Motion for Consolidation of the Related Cases, Appointment As Lead Plaintiff and Approval of Counsel (the "Motion"); and

WHEREAS, on March 14, 2016 this Court consolidated the Related Cases, appointed Louis J. D'Annibale as Lead Plaintiff, and approved Lead Plaintiff's choice of counsel;

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for Lead Plaintiff and the attorneys for Defendants, as follows:

1. No defendant shall be required to answer, move against or otherwise respond to the initial or amended complaints filed in the above-captioned action, except as set forth herein.

2. Lead Plaintiff shall file and serve a second amended class action complaint within sixty (60) days after entry of an order on this scheduling stipulation, which shall serve as the operative complaint in this action and shall supersede any other complaints filed in this action, and/or in any other action transferred to this Court as a related case;

3. Defendants shall have sixty (60) days following the filing of the second amended class action complaint to answer, move, or otherwise respond to that complaint;

4. In the event that Defendants respond to the second amended class action complaint by motion(s), Lead Plaintiff shall file with the Court any opposition to Defendants' motion(s) within forty five (45) days after the filing of any such motion(s);

5. Defendants shall file with the Court any reply brief(s) in support of Defendants' motion(s) within thirty (30) days after service of any opposition brief.

Dated: April 4, 2016

Respectfully submitted,

Lead Plaintiff Louis J. D'Annibale

By: /s/ Joe Kendall

Joe Kendall

Texas Bar No. 11260700

jkendall@kendalllawgroup.com

Jamie J. McKey

Texas Bar No. 24025262

jmckey@kendalllawgroup.com

KENDALL LAW GROUP PLLC

3232 McKinney, Ste 700

Dallas, Texas 75204

Telephone: (214) 744-3000

Facsimile: (214) 744-3015

Liaison Counsel for Lead Plaintiff Louis J. D'Annibale

Lionel Z. Glancy

Lesley Portnoy

Email: lportnoy@glancylaw.com

GLANCY PRONGAY & MURRAY LLP

1925 Century Park East, Suite 2100

Los Angeles, CA 90067

Telephone: (310) 201-9150

Facsimile: (310) 201-9160

Lead Counsel for Lead Plaintiff Louis J. D'Annibale

UNITED DEVELOPMENT FUNDING IV

By: /s/ Barrett R. Howell

Barrett R. Howell

Texas State Bar No. 24032311

barrett.howell@klgates.com

Brandon N. McCarthy

Texas State Bar No. 24027486

brandon.mccarthy@klgates.com

K&L GATES LLP

1717 Main Street, Suite 2800

Dallas, Texas 75201

Telephone: (214) 939-5500

Facsimile: (214) 939-5849

John W. Rotunno

Pro Hac Vice forthcoming

john.rotunno@klgates.com

Paul J. Walsen

Pro Hac Vice forthcoming

paul.walsen@klgates.com

Joseph C. Wylie

Pro Hac Vice forthcoming

joseph.wylie@klgates.com

K&L GATES LLP

70 West Madison Street, Suite 3100

Chicago, Illinois 60602-4207

Telephone: (312) 372-1121

Facsimile: (312) 827-8000

Counsel for Defendant United Development Funding IV

Defendant Hollis M. Greenlaw

By: /s/ Michael P. Gibson

Michael P. Gibson

Texas State Bar No. 7871500

mgibson@bp-g.com

BURLESON, PATE & GIBSON, LLP

900 Jackson Street Suite 330

Dallas, Texas 75202

Telephone: (214) 871-4900

Facsimile: (214) 871-7543

Counsel for Defendant Hollis M. Greenlaw

Defendant Cora D. Obert

By: /s/ Weston C. Loegering

Weston C. Loegering

Texas State Bar No. 1281550

wcloegering@jonesday.com

Evan P. Singer

Texas State Bar No. 24037501

epsinger@jonesday.com

JONES DAY

2727 North Harwood Street

Dallas, Texas 75201

Telephone: (214) 969-5264

Facsimile: (214) 969-5100

Counsel for Defendant Cora D. Obert